

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

**IN RE APPLICATION OF DAILANE
INVESTMENTS LIMITED AND
MICHAEL MAILLIS FOR JUDICIAL
ASSISTANCE PURSUANT TO
28 U.S.C. § 1782**

Case No. 1:22-cv-23619-RKA

**UNOPPOSED MOTION TO APPEAR REMOTELY FOR STATUS
CONFERENCE ON AUGUST 21, 2025**

Petitioners Dailane Investments Limited and Michael Maillis file this Unopposed Motion to Appear Remotely for Status Conference on August 21, 2025 (“Motion”), seeking approval to Appear Remotely via Zoom or telephone at the Status Conference set for August 21, 2025 at 3:30 PM (ECF No. 54) and in support thereof states as follows:

1. Petitioners’ lead counsel is in Washington, D.C. and is not scheduled to be before the Court on any other matters on August 21, 2025, besides this status conference, of which Petitioners received notice today, August 18, 2025.

2. Requiring travel from Washington, D.C. to Miami, Florida for in-person attendance for a status conference in a proceeding with no outstanding procedural or scheduling issues would result in unnecessary expense.

3. The only open issue in this proceeding is Respondents H.I.G. Capital, LLC’s and Sami Mnaymneh’s (I) Objections to Magistrate Judge Order on Motions (ECF No. 50) and (II) Appeal to District Court (ECF No. 52), and Petitioners’ Response in Opposition to Respondents’ Appeal/Objections of Magistrate Judge Reid’s Discovery Order (ECF No. 53). The Magistrate Judge’s Order that is the subject of the Objections confirmed that Petitioner Dailane could use information obtained via this § 1782 proceeding in the Complaint filed in *Dailane Invs. Ltd. v.*

HIG Cap. LLC, No. 25-cv-20568 (S.D. Fla. filed May 5, 2025). On August 6, 2025, this Court denied the Defendants' Motion to Stay and Motion for an Extension to Respond to the Complaint in that lawsuit, ordering HIG Capital LLC and Sami Mnaymneh to respond to the Complaint by August 26, 2025. *Dailane Invs. Ltd. v. HIG Cap. LLC*, No. 25-cv-20568 (S.D. Fla. Aug. 5, 2025), ECF No. 26.

4. Petitioners have no objection to lead counsel appearing in person if the Court wishes to hold a substantive oral argument on the Respondents' Objections. Because Petitioners understand that the Court intends for the status conference to address only administrative issues, Petitioners request to be allowed to appear remotely via Zoom or telephone.

5. Accordingly, the undersigned respectfully requests permission for Petitioners' counsel to appear remotely via Zoom at the status conference set for August 21, 2025, at 3:30 PM.

Local Rule 7.1(a)(2) Certification

Pursuant to Local Rule 7.1(a)(2), counsel for Petitioners has conferred with Respondents' counsel via email on August 18, 2025, to discuss the relief sought herein. Respondents' counsel responded that they do not object to Petitioners' counsel appearing remotely.

Date: August 18, 2025

Respectfully submitted,

SEQUOR LAW, P.A.

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